



June 6, 2006

BY HAND-DELIVERY

**Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110**

**Re: Investigation into Compliance with G.L. c. 164, § 116B
D.T.E. 06-48**

Dear Secretary Cottrell:

Enclosed for filing please find the original and one copy of Fitchburg Gas and Electric Light Company's d/b/a Unitil ("Unitil") responses to the request for information contained in the Department of Telecommunication and Energy's Order Opening an Investigation in Compliance with G.L. c. 164, § 116B, issued May 19, 2006. Copies of these responses are being provided as directed in the Notice of Compliance Investigation and Public Hearing.

Thank you for your attention to this matter.

Sincerely,



Gary Epler

Enclosure

**cc: William Stevens, Assistant General Counsel, Pipeline Engineering and Safety Division
Christopher Bourne, Director, Pipeline Engineering and Safety Division
Joseph Rogers, Assistant Attorney General**

**Gary Epler
Senior Counsel
6 Liberty Lane West
Hampton, NH 03842-1720
Phone: 603-773-6440
Fax: 603-773-6640
Email: epier@unitil.com**

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Compliance with G.L. c. 164 §116B
Docket No: D.T.E. 06-48
Order of Notice Request for Information

Request No. DTE-1-1

Please provide the relevant portion the operator's O&M Plan that ensures compliance with Section 116B.

Response:

See Attachment FG&E-DTE-1 A and B

Persons Responsible: Raymond Letourneau, Jr., Chris Dube **Date:** June 6, 2006

Attachment FG&E-DTE-1-1 A

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Compliance with G.L. c. 164 §116B
Docket No: D.T.E. 06-48
Order of Notice Request for Information

Request No. DTE-1-2

Please provide an Excel spreadsheet of service territory streets that were paved in 2005, and the date that the gate boxes were made "easily and immediately accessible."

Response:

See Attachment FG&E-DTE-2

Person Responsible: Raymond Letourneau, Jr., Chris Dube **Date:** June 6, 2006

Attachment FG&E-DTE-1-2 A

**Unitil/Fitchburg Gas and Electric
2005 City and Town Paving Schedule**

Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Bel Air Drive	Hollywood St	Gardner St	0	0	0	NA
	Cedar St.	Pearl St	Congress St	0	0	0	NA
	Chabot Drive	Miami Street	Bel Air Drive	0	0	0	NA
	Cross St.	Laurel St	South St	0	3	3	10/24/05
	Daniels St.	Oak Hill Road	Reingold Ave	0	0	0	NA
	Francis St.	Thomas St	Charles St	0	0	0	NA
	Townsend St.	Eastwood Club	City Line	0	0	0	NA
	Williams Road	McIntire Road	Ashburnham Hill Rd	No Gas	No Gas	No Gas	NA
	Lunenburg St.	Moran Square	Redman Place	1	9	10	wk of 5-9-05
	Summer St.	John Fitch Highway	Fifth St	1	14	15	wk of 6-13-05

Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Greenwood St.	Parker St	Baker St	2	0	2	wk of 9-12-05
	Howe St.	All		No Gas	No Gas	No Gas	NA
	Chestnut St.	Logan St	Pearson Blvd	0	0	0	NA
	Lawrence St.	All		1	0	1	wk of 9-19-05
	Winslow St.	All		0	0	0	NA
	Court Rd.	All		0	0	0	NA
	Comee St.	All		No Gas	No Gas	No Gas	NA
	Mathews St.	All		No Gas	No Gas	No Gas	NA

Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Hamilton Hill Rd.	All		0	0		NA
	Wheeler Road	Ashby end		No Gas	No Gas		NA
	Lunenburg Road	Wyman Road	Town Line	No Gas	No Gas		NA
	Old Meeting House Rd.	Rte 119	South for 800lf	0	0		NA
	Pearl Brook Road	All		No Gas	No Gas		NA
	Ash St. @ South Harbor Rd.	Intersection only		1	0	1	9/16/2005
Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Leominster St	All		0	0	0	NA
Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Prospect St						
	Laurel Lane						
	Leominster Road						
	Whiting St.						
	Rte 2A	Arbor	Sunnyhill				
	Northfield Road	Rte 2A	Oak				
	Oak Ave						
	Main St.						
Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	No Paving in 2005						

Attachment FG&E-DTE-1-2 B

Unitil/Fitchburg Gas and Electric							
2005 Paving and Gate Valve/Structure Adjustment Schedule							
Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Cross St.	Laurel St	South St	0	3	3	10/24/05
	Lunenburg St.	Moran Square	Redman Place	1	9	10	wk of 5-9-05
	Summer St.	John Fitch Highway	Fifth St	1	14	15	wk of 6-13-05
City of Gardner							
Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Greenwood St.	Parker St	Baker St	2	0	2	wk of 9-12-05
	Lawrence St.	All		1	0	1	wk of 9-19-05
City of Fitchburg							
Year	Street	From	To	Main Gate Boxes Identified	Service Gate Boxes Identified	Total Structures Adjusted	Date Adjusted
2005	Ash St. @ South Harbor	Intersection only		1	0	1	9/16/2005

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Compliance with G.L. c. 164 §116B
Docket No: D.T.E. 06-48
Order of Notice Request for Information

Request No. DTE-1-3

Please provide the relevant portion the operator's O&M Plan that delineates policies concerning how an operator collects data to ensure compliance with Section 116B.

Response:

Please see the response to DTE-1-1, above, and Attachment FG&E-DTE-1-1 A and B.

Person Responsible: Raymond Letourneau, Jr., Chris Dube **Date:** June 6, 2006

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Compliance with G.L. c. 164 §116B
Docket No: D.T.E. 06-48
Order of Notice Request for Information

Request No. DTE-1-4

Please provide all relevant evidence that operators are in compliance with Section 116B.

Response:

See enclosed disk labeled "DTE 06-48: FG&E Response to DTE 1-4" containing pictures of gate boxes adjusted and completed in 2005.

Person Responsible: Raymond Letourneau, Jr., Chris Dube **Date:** June 6, 2006

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Compliance with G.L. c. 164 §116B
Docket No: D.T.E. 06-48
Order of Notice Request for Information

Request No. DTE-1-5

Please provide all relevant evidence that demonstrates that all valves on its mains and all curb valves on its service lines are immediately and readily accessible.
Requirements applicable to valves on mains are described in Part 192, § 192.181.
Requirements for service line valves are described in Part 192, § 192.365 and in 220 C.M.R. § 101.06(14).

Response:

See Attachment FG&E-DTE-1-5.

Person Responsible: Raymond Letourneau, Jr., Chris Dube **Date:** June 6, 2006

Attachment FG&E-DTE-1-5

Unitil/Fitchburg Gas and Electric 2005 Critical Valve Inspections

Comments

F-1	Lunenburg @ John Fitch Hwy.	6"	6/13/2005	GOOD
F-2	John Fitch @ Berkey Phot (Reg.Pit)	6"	(NO LONGER IN SERVICE) replaced with cluster @JFH	
F-3	Lunenburg @Thunderbird Motel	8"	6/13/2005	GOOD
F-3 A	Lunenburg Street @ Klondike Ave	8"	6/13/2005	New maps made
F-4	Lunenburg Street @ GarlandSt	8"	Replaced with cluster at JFH @ Lunenburg	
F-4A	Sawyer Passway	8"	6/14/2005	GOOD
F-4B	River St.	8"	6/13/2005	GOOD
F-5	Water St @ Birch	8"	6/13/2005	GOOD
F-6	Water St @ Birch	8"	6/13/2005	GOOD
F-7	Water St @ Birch	6"	6/13/2005	GOOD
F-8	John Fitch Highway @ Shopping Center	8"	6/14/2005	GOOD
F-9	Westminster St @ Bridge	8"	5/12/2005	REPAIR GREASE STEM
F-9A	Beech Street@ FranklinRd	8"	6/15/2005	GOOD
F-9B	Depot@ Westminster	8"	4/10/2005	SEE NOTES ON SHEET
F-10	Rte@A Fitchburg/Westminster Line	8"	4/26/2005	New map made
F-10A	Townsend St Bridge(Fitchburg Side)	4"	4/26/2005	New map made
F-10B	Townsend St Bridge(Townsend Side)	4"	4/26/2005	New map made

ASHBY

A-11	County Rd @ Damon Rd	4"	4/20/2005	Measurements Changed
A-12	Ashby State Rd @ Fitchburg/Ashby Line	4"	4/20/2005	OK
A-14	Wheeler Road @ Willard brook	4"	4/20/2005	OK

TOWNSEND

T-15	Main Street Bridge Townsend Center	4"	4/25/2005	OK
T-16	Main Street @ Worcester Road	4"	4/25/2005	GOOD
T-17	Route 13 @ Emery Road	4"	4/20/2005	GOOD
T-18	Route 13 @ Townsend/Lunenburg Line	4"	4/20/2005	Changed Measurement
T-19	Warren Rd. @ Bridge (Townsend Harbor)	8"	4/20/2005	4" AND 8" KEROTEST
T-20	Worcester Rd@Rte 13 Townsend	4"	4/25/2005	OK
T-20A	Turnpike Rd Bridge	2"	4/25/2005	GOOD
T-20B	Turnpike Rd Bridge	2"	4/25/2005	GOOD

GARDNER

G-21	Logan Street@ Reg Sta-3 Valves	6"	6/14/2005	OVERSIZE VALVE STEM
G-22S	Pleasant St @Railroad	6"	4/5/2005	OK
G-22N	Pleasant St @Railroad	6"	4/5/2005	SEE NOTES
G-23	Temple Street-2 Valves	6"	4/5/2005	SEE NOTES
G-23A	Right of Way East Industrial Park	6"	4/5/2005	OK
G-23B	Right of Way @Railroad and Rte 2	6"	4/5/2005	OK

WESTMINISTER

W-24	St Rd. West@Shady Ave	8"	4/5/2005	GOOD
W-25	ShadyAve @ West Main	6"	4/5/2005	SEE NOTES

LUNENBURG

L-26	Pleasant Street @ Gate House		out of service scheduled for replacement	
------	------------------------------	--	--	--

VALVE INSPECTION PROTOCOL

- Locate the valve box
- Check existing measurements and create new measurements/reference points if necessary.
- Check the valve box with a combustible gas indicator.
- If necessary, clean out the valve box so that the valve will be accessible for proper operation.
- Check the valve position:
 - Leave valve in same position found
 - Indicate on the inspection record the position found
- Check the valve operation:
 - Valves normally open, crack towards the closed position
 - Valves normally closed, crack valves towards open position.
- Lubricate valve only when it is leaking or it is difficult to turn.
- Align the valve box and adjust it to proper grade.
- Recheck the valve box with a combustible gas indicator.
- Paint the top of the valve box yellow.
- Complete the inspection record.

CRITICAL VALVE ANNUAL INSPECTIONS

CRITICAL VALVE I.D. #: _____ INSPECTION DATE: _____

LOCATION: _____ CITY: _____

VALVE SIZE: _____ VALVE TYPE: _____ VALVE MAKE: _____


1) EXISTING MEASUREMENTS ACCURATE:	YES	NO	
2) CHECK VALVE BOX WITH CGI:	YES	NO	
3) VALVE LEAKING:	YES	NO	
4) WRENCH ON:	YES	NO	
5) VALVE POSITION:	OPEN	CLOSED	
6) VALVE TURNED:	YES	NO	
7) VALVE LUBRICATED:	YES	NO	N/A
8) VALVE BOX PROPERLY ALIGNED:	YES	NO	
9) VALVE BOX TOP PAINTED:	YES	NO	

IF THE ANSWER TO ANY OF THE ABOVE IS NO, PLEASE EXPLAIN. _____

COMMENTS / ADDITIONAL WORK NEEDED: _____

EMPLOYEE: _____

ENGINEERING VALVE I.D. # _____

	GAS OPERATIONS AND MAINTENANCE PROCEDURES	MAINTENANCE REVISION: 10/18/04 PAGE: 23 of 68
---	--	--

If the purpose of the visit is to investigate an indoor leak, follow O&M Procedure 2.22.00.

If the purpose of the visit is to perform work on the gas meter, furnace or water heater, do the following:

- Turn on the combustible gas detection instrument in the outside free air, test batteries and zero the instrument.
- Using the combustible gas detection instrument, leak survey the company owned interior gas piping and inspect for severe corrosion. Begin at the meter outlet connection and survey the piping back to where the service line enters the building.
- Write down the observed reading (e.g. 0.00% gas) in the space provided or in the comment section on the work order.

2.17.02 EXCEPTIONS:

No leak survey is needed if:

- The gas meter is on a different floor than the furnace or water heater being serviced, or
- A locked door prevents access to the meter, fit or interior gas piping or
- The employee or company representative is solely reading a meter.
- If access is not possible, indicate the reason on your work order

2.18.0 DISTRIBUTION VALVE INSPECTION

General:

Maintain a continuing program to make gate boxes easily and immediately accessible as specified in 49 C.F.R. Part 192 § 192.181, 192.605(a), 192.605(b) and Massachusetts General Law c.164, § 116B.

- Locate the valve box. Check existing measurements and correct to field conditions using above ground reference points if necessary.
- Check the valve box with a combustible gas indicator.
- If necessary, clean out the valve box so that the valve will be accessible for proper operation.
- Check the valve position.
 - Leave valve in same position as found.



**GAS OPERATIONS
AND MAINTENANCE
PROCEDURES**

MAINTENANCE
REVISION: 10/18/04
PAGE: 24 of 68

- Indicate on the inspection record (below) the position found.
- Check the valve operation:
 - Normally open valves – crack valve towards closed position and reopen.
 - Normally closed valves – crack valve towards open position and reclose.
- Lubricate a valve only when it is leaking or if it is difficult to turn.
- Align the valve box and adjust it to proper grade.
- Recheck the valve box with a combustible gas indicator.
- Paint the top of the valve box if required.
- Complete the inspection record.(Below)

DISTRIBUTION VALVE INSPECTIONS FORM

VALVE I.D. #: INSPECTION DATE: _____


LOCATION: CITY: _____

VALVE SIZE: _____ VALVE TYPE: _____ VALVE MAKE: _____

- | | | |
|------------------------------------|------------|--------------|
| 1) EXISTING MEASUREMENTS ACCURATE: | yes _____ | no _____ |
| 2) CHECK VALVE BOX WITH CGI: | yes _____ | no _____ |
| 3) VALVE LEAKING: | yes _____ | no _____ |
| 4) WRENCH ON: | yes _____ | no _____ |
| 5) VALVE POSITION: | open _____ | closed _____ |
| 6) VALVE TURNED: | yes _____ | no _____ |
| 7) VALVE LUBRICATED: | yes _____ | no _____ |
| 8) VALVE BOX PROPERLY ALIGNED: | yes _____ | no _____ |
| 9) VALVE BOX TOP PAINTED: | yes _____ | no _____ |

IF THE ANSWER TO ANY OF THE ABOVE IS NO, PLEASE EXPLAIN.
COMMENTS /ADDITIONAL WORK NEEDED:

EMPLOYEE: _____
ENGINEERING VALVE I.D. # _____

	GAS OPERATIONS AND MAINTENANCE PROCEDURES	MAINTENANCE REVISION: 10/18/04 PAGE: 25 of 68
---	--	--

2.19.00 Critical Valve Inspection

The Company will inspect all critical valves annually; the procedure is the same as for distribution valve inspections. See section 2:18:00 Distribution Valve Inspection

2.20.00 REPORTED LEAKS ASSOCIATED WITH DAMAGE TO GAS LINES

- On arrival at the location, check all buildings to determine the presence of gas. Follow the steps outlined in O&M Procedures 2.21.00, 2.22.00 and 2.23.00 as applicable.
- Evaluate the damage.
- Control the flow of gas using appropriate procedures
- Complete the necessary repairs
- Complete the required reports.

2.21.00 LEAK CLASSIFICATION

2.21.01 CLASS I LEAKS:

This classification includes gas leaks of sufficient magnitude that immediate repairs are indicated.

Involving public safety where leaking gas is:

- Near or entering a building regardless of the magnitude.
- In the ground adjacent to a building regardless of the magnitude.
- Continuous, positive combustible gas indicator readings in a manhole, or other street opening.
- Class 1 Leaks are to be re-surveyed 30 days after the leak is repaired.

2.21.02 CLASS II LEAKS:

This classification includes gas leaks that are not creating a public hazard at the time of detection. These include gas leaks where:

- In the judgement of the field supervisor the leak might develop into a Class I leak should changes occur, such as:
 - Frost penetration.
 - Paving installation or repairs.